

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

K.C., *et al.*,

Plaintiffs,

v.

No. 1:23-cv-00595-JPH-KMB

THE INDIVIDUAL MEMBERS OF THE
MEDICAL LICENSING BOARD OF
INDIANA, in their official capacities, *et al.*,

Defendants.

Declaration of Lisa Welch and Ryan Welch

Come now Lisa Welch and Ryan Welch, being duly sworn upon their oath, and say that:

1. We are adult residents of Marion County, Indiana.
2. We are the parents of plaintiff M.W. who is currently 16.
3. Although M.W.'s birth-assigned sex was female, for some time he has suffered depression and anxiety concerning the fact that his gender identity was that of a boy.
4. He socially transitioned at 14 and has consistently used a boy's first name since then and dresses and presents as male.
5. He has been seen and treated by medical professionals at the Riley Gender Health Program since 2022 and was diagnosed as suffering from gender dysphoria. The Riley Gender Health Program is operated by Riley Children's Hospital and Indiana University

Health and offers comprehensive medical care and other support to children, teens, and young adults under the age of 21 who, among other things, suffer from gender dysphoria.

6. The gender dysphoria has caused M.W.'s depression and anxiety inasmuch as there is a profound disconnect between the gender he was assigned at birth and his gender identity, which is clearly male.

7. Before he began to seek care at Riley, we purchased a chest binder for M.W. to wear to allow his body to better conform to his male identity. The medical professionals at Riley have given him further instruction on wearing the chest binder.

8. The medical professionals at Riley also prescribed testosterone for him that he has been receiving for approximately a year.

9. M.W. began to receive the testosterone as part of his gender-affirming therapy only after the medical professionals at Riley fully discussed the hormone with us and with M.W. and we were informed of its benefits and potential negative side effects.

10. M.W. also receives mental health therapy to assist him in dealing with the negative mental health effects of his gender dysphoria.

11. With the testosterone he has developed male characteristics, including facial hair and changes to his musculature. His voice has also deepened. It is our understanding that he will continue in his development of male characteristics as he continues to receive testosterone.

12. The positive changes in M.W. since he has begun to receive testosterone are profound.

13. As he has developed more of a male physical appearance, there has been an enormous decrease in the symptoms of his gender dysphoria. His depression and anxiety have decreased, and he has made friends who treat him as the boy that he is.

14. His whole attitude has changed for the better.

15. If his hormone therapy is no longer allowed to occur, the development of his male body will cease and he will, instead, develop female characteristics.

16. This will be extremely devastating to him. Before receiving testosterone, we watched our son struggle with gender dysphoria and its negative effects. It is clear that the receipt of the testosterone has caused him to be much happier and is allowing him to live as he is, an adolescent boy. Without the testosterone he will revert to experiencing the profoundly negative effects of gender dysphoria.

17. The hormones are a medical necessity for him.

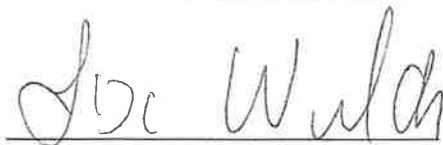
18. We have exercised our rights as M.W.'s parents to agree that he receive this necessary treatment after we were informed of both its likely benefits and its potential negative consequences, and we most certainly wish for him to continue this treatment.


19. We strongly believe that we made the right choice for our son, and we strongly believe that we, in consultation with our son and medical professionals, have the right to do this and that the State should not be interfering with parental rights in the way that S.E.A 480 clearly does.

Verification

We verify under penalty of perjury that the foregoing is true and correct.

Executed on: 4/17/23


Lisa Welch


Ryan Welch

Prepared by:

Kenneth J. Falk
ACLU of Indiana